

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THE MAGNAVOX COMPANY, a
Corporation, and
SANDERS ASSOCIATES, INC.,
a Corporation,

Plaintiffs,

v.

APF ELECTRONICS, INC., ET AL.

Defendants.

Consolidated Civil
Action Nos.

77C3159
78C4951
78C5041
80C4124

JUDGE G. N. LEIGHTON

MAY 17 1982

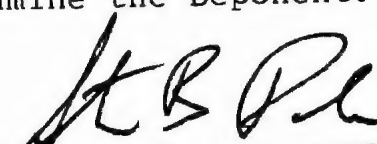
NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that commencing at 1:30 P.M. on the 17th day of May, 1982 at the offices of Neuman, Williams, Anderson & Olson, 77 West Washington Street, Chicago, Illinois 60602, and in accord with prior agreement among counsel to the parties hereto, Defendant APF in the above identified action will take the deposition of THE MAGNAVOX COMPANY (hereinafter "Deponent"), pursuant to Rule 30(b)(6), Fed.R.Civ.P. The matters on which examination is requested under Rule 30(b)(6) are set forth in Attachment A hereto. Deponent is requested to designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, as to the matters set forth in Attachment A hereto and known or reasonably available to Deponent and is requested to make this designation available to Plaintiff at least two days prior to the commencement of the deposition.

Further, Deponent is requested to bring with him for production and for purposes of examination the documents set forth in Attachment B hereto.

The deposition will be taken upon oral examination before a Notary Public, or before some other officer authorized by law to administer oaths. The oral examination will continue from day-to-day or by adjournment until completed.

Each of the parties to this litigation are invited to attend and cross examine the Deponent.



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Dated: New York, New York
May 12, 1982

Attachment A

1. The identification of all television games manufactured, used and/or sold by The Magnavox Company within the United States.

2. The manner in which the television games identified in paragraph 1. hereof are played.

3. The design, circuitry, construction and operation of the television games identified in paragraph 1. hereof.

4. The circuitry and operation of, and the facts and circumstances surrounding the purchase of any integrated circuit component included within any of the television games identified in paragraph 1. hereof.

5. The custody, authenticity and accuracy of the documents produced by The Magnavox Company in accordance with Attachment B hereto annexed and/or in response to previous requests for production to The Magnavox Company.

6. The matters within the personal knowledge of the persons designated to testify upon behalf of The Magnavox Company.

Attachment B

1. Service manuals or instruction manuals or circuit schematics for the following television games manufactured by The Magnavox Company:

<u>MODEL</u>	<u>YEAR</u>
BG7500 ODYSSEY 300	1976
BG7520 ODYSSEY 500	1976
BH7514 3000	1976
BH7511 ODYSSEY 4000	1977
BJ7600 ODYSSEY ²	1978-1981
BG4305 TV with built-in game	1976
PH7704 WONDER WIZARD	
BULLS EYE	1977
PH7705 WONDER WIZARD	
SHARP SHOOTER	1977
Game Cartridges for use with BJ7600	1978-1981

2. Any documents between The Magnavox Company and General Instruments Corporation notifying General Instruments that its manufacture of integrated circuit chips represents infringement, contributory infringement or inducement infringement of the Re.-28,507 patent or the patent upon which it is based.

3. Any document between The Magnavox Company and General Instruments Corporation that relates to or discusses the granting of a license to General Instruments under the Re.-28,507 patent.

4. Any document between The Magnavox Company and General Instruments Corporation that relates to or discusses infringement, inducement or contributory infringement of the Re.-28,507 patent by General Instruments.